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*NOT ADMITTED TO THE NEW YORK BAR

April 11, 2013

By Email and Hand Delivery

Hon. Denise L. Cote
United States District Judge
United States Courthouse
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*In re Petition of Pandora Media, Inc., 12 Civ. 8035 (DLC)
related to U.S. v. Am. Soc'y of Composers, Authors and Publishers, 41 Civ. 1395 (DLC)*

Dear Judge Cote:

On behalf of both parties in the above-referenced proceeding—Pandora Media, Inc. and the American Society of Composers, Authors and Publishers—I enclose a [Proposed] Amended Stipulated Protective Order. The reason for the proposed amendment is that some of the third parties upon which the parties have served document subpoenas have asked—for competitive reasons—to produce certain documents on an “outside counsel only” basis. In order to expedite the production of those documents, the parties have agreed to amend the Stipulated Protective Order entered by Your Honor on January 25, 2013 to include an additional “Outside Counsel Only” level of protection for certain documents produced by third parties.

Respectfully submitted,

Darren W. Johnson

cc: All counsel (via email)